

**REMARKS**

The Examiner is thanked for the performance of a thorough search.

Claim 1 has been amended. No claims have been canceled or added. Hence, Claims 1, 4-12, 17, 20-28, and 33-38 are pending in the present application.

Each issue raised in the Office Action mailed March 7, 2007 is addressed hereinafter.

**I. SUMMARY OF TELEPHONE INTERVIEW**

The Examiner is thanked for granting the courtesy of a telephone interview on May 23, 2007. Examiner Patel and Applicant's representatives Brian D. Hickman and Stoycho D. Draganoff attended the interview. Claim 1 and proposed amendments thereof were discussed. The references discussed were Lau et al., U.S. Publication No. 2002/0184213 ("LAU") and Vedula et al., U.S. Patent No. 6,823,495 ("VEDULA"). An agreement regarding patentability was not reached.

The Applicant's representatives explained why VEDULA and LAU do not describe or suggest the feature of using a mapping scheme to perform a single transformation that moves a set of data directly from a source into a target without materializing the entire set of data separate from the source and the target during the transformation, where one of the source and the target is a relational database. The Examiner indicated that the proposed amendment to Claim 1 seems to overcome VEDULA and LAU, but that further consideration of the amended Claim 1 and an updated search may be required.

**II. ISSUES RELATING TO THE PRIOR ART**

**A. INDEPENDENT CLAIM 1**

Claim 1 was rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over LAU in view of VEDULA.

Claim 1 comprises the features of:

...  
using said mapping scheme to perform a single transformation that moves a set of data directly from said source into said target without materializing the entire set of data separate from said source and said target during said transformation;

wherein said source is one of a relational database and an XML document and said target is the other of said relational database and said XML document;

wherein the one or more attributes, of the one of said source and said target that is said relational database, correspond to one or more columns in one or more tables in said relational database.

It is respectfully submitted that the above features of Claim 1 are not shown or suggested by any of the cited references.

As discussed during the Telephone Interview of May 23, 2007, Claim 1 addresses a problem that exists in conventional approaches for transforming a set of data from a source to a target, where one of the source and the target is a relational database and the other of the source and the target is an XML document. The problem is that when one of the source and the target is a relational database, under the conventional approaches multiple transformations of the set of data need to be performed and the set of data needs to be materialized multiple times before being transferred to the target. Claim 1 addresses this problem by providing the feature of using a mapping scheme to perform a single transformation of a set of data directly from the source into the target without materializing the entire set of data separate from the source and the target during the transformation.

It is respectfully submitted that both LAU and VEDULA are directed to conventional approaches that suffer from the problem described above. As discussed during the Telephone Interview of May 23, 2007, both LAU and VEDULA describe transformations that are performed by using XSLT style sheets. (See at least LAU - paragraphs [0054], [0080]; VEDULA – FIG. 2 and col. 9, lines 42-54). As is well known, XSLT style sheets are used to transform data between XML documents. It is also well known that performing XSLT transformations

requires that the entire source data being transformed must be in an XML format before an XSLT style sheet is applied, and that the XSLT transformation returns as output the entire transformed data in XML format. Thus, when the source or the target is a relational database, performing an XSLT transformation to transfer a set of data necessarily involves multiple data transformation steps.

For these reasons, LAU and VEDULA whether taken alone or in combination do not describe or suggest all features of Claim 1. Thus, it is respectfully submitted that Claim 1 is patentable under 35 U.S.C. § 103(a) over LAU in view of VEDULA. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

**B. DEPENDENT CLAIMS 4-12, 17, AND 20-28**

Claims 4-12, 17, and 20-28 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over LAU in view of VEDULA.

Each of Claims 4-12, 17, and 20-28 depends directly or indirectly from independent Claim 1, and therefore includes each and every feature of the independent base claim. Thus, each of Claims 4-12, 17, and 20-28 is allowable for the reasons given above for Claim 1. In addition, each of Claims 4-12, 17, and 20-28 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 4-12, 17, and 20-28 are allowable for at least the reasons given above with respect to Claim 1. Reconsideration and withdrawal of the rejections of Claims 4-12, 17, and 20-28 is respectfully requested.

**III. CONCLUSION**

The Applicant believes that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, the Applicant respectfully submits that allowance of the

pending claims is appropriate. Reconsideration of the present application is respectfully requested in light of the amendments and remarks herein.

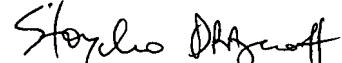
The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firms check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

Dated: May 31, 2007

  
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